

**ATTACHMENT B**  
**PROPOSED SPECIAL VERDICT**

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA, ) CASE NO. CR 17-00533 EMC  
Plaintiff, )  
v. )  
JONATHAN JOSEPH NELSON, et al., )  
Defendants. )

## **(PROPOSED) SPECIAL VERDICT**

We, the jury in the above-captioned case, present the following unanimous verdict:

Following the guilty verdict against the defendants on Count One of the Superseding Indictment, the government seeks forfeiture of the following property:

## A. Motorcycles

The United States has, in its custody, motorcycles that were seized by state, local or federal law enforcement agencies as a result of the investigation into the racketeering and overt acts alleged in the Superseding Indictment. For any of these items, answer the following question: Do you unanimously find by a preponderance of the evidence that this property is subject to forfeiture?

1. One Harley Davidson motorcycle, license plate number 21M1780,

Yes \_\_\_\_\_ No \_\_\_\_\_

2. One Harley Davidson motorcycle, license plate number 21J9345,

Yes \_\_\_\_\_ No \_\_\_\_\_

3. One Harley Davidson motorcycle, license plate number 16N5106,

4. One Harley Davidson motorcycle, license plate number 22F4360,

1       5. One Harley Davidson motorcycle, license plate number 20A9211,

2                   Yes \_\_\_\_\_ No \_\_\_\_\_

3       6. One Harley Davidson motorcycle, license plate number 20H2093

4                   Yes \_\_\_\_\_ No \_\_\_\_\_

5                   **B. Firearms and Ammunition from 1514 Fallbrook Avenue**

6       The United States has, in its custody, firearms and ammunition that were seized by state, local or  
7       federal law enforcement agencies from 1514 Fallbrook Avenue, Clovis, CA on or about July 18, 2018 as  
8       a result of the investigation into the racketeering and overt acts alleged in the Superseding Indictment.

9       For any of these items, answer the following question: Do you unanimously find by a preponderance of  
10      the evidence that this property is subject to forfeiture?

11      1. AK firearm Make: ROMARM/CUGIR, Model: WASR-10, S/N: A1-33344-15, caliber:  
12                   762,

13                   Yes \_\_\_\_\_ No \_\_\_\_\_

14      2. PMAG 30 round 762 magazine, found loaded in AK,

15                   Yes \_\_\_\_\_ No \_\_\_\_\_

16      3. Two rounds 762, found loaded in AK magazine,

17                   Yes \_\_\_\_\_ No \_\_\_\_\_

18      4. PMAG D-60 drum style magazine, 556 caliber, 60 round capacity. Found loaded in short  
19       barrel rifle,

20                   Yes \_\_\_\_\_ No \_\_\_\_\_

21      5. Short barrel rifle Make: Anderson Manufacturing, Model: AM-15, cal556 multi caliber,  
22       S/N:16426711,

23                   Yes \_\_\_\_\_ No \_\_\_\_\_

24      6. 54 rounds 556 ammunition found loaded in short barrel in drum mag,

25                   Yes \_\_\_\_\_ No \_\_\_\_\_

26      7. Rifle Make: Remington, Model: 700, caliber 17, S/N: 6409654,

27                   Yes \_\_\_\_\_ No \_\_\_\_\_

28      8. Ruger 22 caliber single six revolver, S/N:382552, found loaded with six rounds,

1 Yes \_\_\_\_\_ No \_\_\_\_\_

2 9. Handgun Make: Kimber, Model: Micro 9, Caliber: 9mm, S/N: PB0010070, and  
3 nine rounds of 9mm ammunition from magazine in gun case,

4 Yes \_\_\_\_\_ No \_\_\_\_\_

5 10. High capacity 9mm Glock magazine, found holding 32 rounds 9 mm,

6 Yes \_\_\_\_\_ No \_\_\_\_\_

7 11. 34 rounds 9mm; 32 removed from high-capacity mag,

8 Yes \_\_\_\_\_ No \_\_\_\_\_

9 12. 57 rounds 223 ammunition removed from magazines,

10 Yes \_\_\_\_\_ No \_\_\_\_\_

11 13. Eight rounds 17 Remington in Remington box,

12 Yes \_\_\_\_\_ No \_\_\_\_\_

13 14. 30 rounds 556 from PMAG magazine,

14 Yes \_\_\_\_\_ No \_\_\_\_\_

15 16. One Ruger Pistol, Model: P89, Caliber: 9, S/N: 309-40411 and one magazine,

17 Yes \_\_\_\_\_ No \_\_\_\_\_

18 17. Handgun Make: Glock, Model: 17 Cal: 9mm; S/N BEB199 with magazine, Smyrna GA,

19 made in Austria,

20 Yes \_\_\_\_\_ No \_\_\_\_\_

21 18. Eight rounds 9mm removed from magazine,

22 Yes \_\_\_\_\_ No \_\_\_\_\_

23 19. Ammunition 16 rounds 9mm from magazine and one round from chamber of Glock; S/N:

24 BBCU144,

25 Yes \_\_\_\_\_ No \_\_\_\_\_

26 20. Glock Model: 17 Cal: 9mm; S/N: BBCU144 with magazine found loaded with one round

27 in chamber,

1 Yes \_\_\_\_\_ No \_\_\_\_\_

2 21. Bulldog .44 SPL Revolver, S/N: 13-20095, Charter Arms, Shelton, CT, made in USA  
3 found loaded,

4 Yes \_\_\_\_\_ No \_\_\_\_\_

5 22. One box of 12 ga Winchester Ammunition,

6 Yes \_\_\_\_\_ No \_\_\_\_\_

7 23. Seven rounds 9mm,

8 Yes \_\_\_\_\_ No \_\_\_\_\_

9 24. Rifle "K23 Pistol" Olympic Arms; S/N: AW2228 multi caliber OLY WA with magazine,

10 Yes \_\_\_\_\_ No \_\_\_\_\_

11 25. 5.56 ammunition contained in magazine,

12 Yes \_\_\_\_\_ No \_\_\_\_\_

13 26. One (1) Glock Pistol, Model: 42, Caliber: 380, S/N: ACPM446, with magazine, found  
14 loaded,

15 Yes \_\_\_\_\_ No \_\_\_\_\_

16 27. Six rounds .380 ammunition, removed from loaded Glock 42,

17 Yes \_\_\_\_\_ No \_\_\_\_\_

18 **C. Firearms and Ammunition from 129 Carillo Santa Rosa**

19 The United States has, in its custody, firearms and ammunition that were seized by state, local or  
20 federal law enforcement agencies from 129 Carillo Santa Rosa, CA, on November 18, 2017, as a result  
21 of the investigation into the racketeering and overt acts alleged in the Superseding Indictment. For any  
22 of these items, answer the following question: Do you unanimously find by a preponderance of the  
23 evidence that this property is subject to forfeiture?

24 1. Glock 9 mm handgun, Model 19, S/N BLT097 and nine 9 mm bullets and one magazine,

25 Yes \_\_\_\_\_ No \_\_\_\_\_

27 2. Ruger revolver, Model RG40, 40 caliber, S/N R114206,

28 Yes \_\_\_\_\_ No \_\_\_\_\_

1                   **D.      Firearms from 742 Blair Place**

2                   The United States has, in its custody, firearms that were seized by state, local or federal law  
 3 enforcement agencies from 742 Blair Place, Santa Rosa, CA on or about November 18, 2017, as a result  
 4 of the investigation into the racketeering and overt acts alleged in the Superseding Indictment. For any  
 5 of these items, answer the following question: Do you unanimously find by a preponderance of the  
 6 evidence that this property is subject to forfeiture?

7                   1. Remington shotgun, Model: 870, Caliber 12, S/N: RS89380K,

8                   Yes \_\_\_\_\_ No \_\_\_\_\_

9                   2. Ruger Revolver, Caliber: 38, Model: 05401, S/N: 542-29332,

10                  Yes \_\_\_\_\_ No \_\_\_\_\_

11                  **E.      Firearms and Ammunition from 1092 Camino Coronado**

12                  The United States has, in its custody, firearms and ammunition that were seized by state, local or  
 13 federal law enforcement agencies from 1092 Camino Coronado, Rohnert Park, CA on or about  
 14 November 19, 2017, as a result of the investigation into the racketeering and overt acts alleged in the  
 15 Superseding Indictment. For any of these items, answer the following question: Do you unanimously  
 16 find by a preponderance of the evidence that this property is subject to forfeiture?

17                  1. One Glock Model 19, 9 mm caliber, S/N: DWB580 with one magazine and ammunition,

18                  Yes \_\_\_\_\_ No \_\_\_\_\_

19                  2. One North American Arms, Model unknown, caliber unknown, S/N: D90480 and  
 20 ammunition,

21                  Yes \_\_\_\_\_ No \_\_\_\_\_

22                  3. One Walther Model P22, .22 caliber, S/N: WA119916, with one magazine and  
 23 ammunition,

24                  Yes \_\_\_\_\_ No \_\_\_\_\_

25                  4. One Mossberg, Model 188, 12 gauge, S/N: MV182045,

26                  Yes \_\_\_\_\_ No \_\_\_\_\_

27                  5. One Savage rifle, Model 3b, .22 caliber, S/N: unknown,

28                  Yes \_\_\_\_\_ No \_\_\_\_\_

1       6. One Marlin firearms, Model 795, .22 LR caliber, S/N: MM09374G,

2           Yes \_\_\_\_\_ No \_\_\_\_\_

3       7. One Springfield Armory, Model XD9, 9mm caliber, S/N: XD188023,

4           Yes \_\_\_\_\_ No \_\_\_\_\_

5       **F. Firearms and Ammunition from HAMC Sonoma County at 516 Frazier Avenue**

6       The United States has, in its custody, firearms and ammunition that were seized by state, local or  
7       federal law enforcement agencies from HAMC Sonoma County at 516 Frazier Avenue, Santa Rosa, CA  
8       on or about November 19, 2017, as a result of the investigation into the racketeering and overt acts  
9       alleged in the Superseding Indictment. For any of these items, answer the following question: Do you  
10      unanimously find by a preponderance of the evidence that this property is subject to forfeiture?

11       1. Glock 43; S/N: BCFE680, and 6 rounds of ammunition removed,

12           Yes \_\_\_\_\_ No \_\_\_\_\_

13       2. Springfield Armory 45 ACP; S/N: XS569531 and removed loaded magazine,

14           Yes \_\_\_\_\_ No \_\_\_\_\_

15       **G. Firearms and Ammunition from 648 Auburn St**

16       The United States has, in its custody, firearms and ammunition that were seized by state, local or  
17       federal law enforcement agencies from 648 Auburn St, Tulare, CA on or about November 20, 2017 as a  
18       result of the investigation into the racketeering and overt acts alleged in the Superseding Indictment.  
19       For any of these items, answer the following question: Do you unanimously find by a preponderance of  
20      the evidence that this property is subject to forfeiture?

21       1. One Browning Rifle, S/N: 04984ZV358,

22           Yes \_\_\_\_\_ No \_\_\_\_\_

23       2. One magazine containing 7.62x39 ammunition,

24           Yes \_\_\_\_\_ No \_\_\_\_\_

25  
26  
27       3. Century Arms Rifle, AK-47, 7.62x39 caliber, S/N: AB2-C106909 & 527795 (upper and  
28           lower has a serial number each),

1 Yes \_\_\_\_\_ No \_\_\_\_\_

2 4. One magazine containing 3- 300 caliber ammo,

3 Yes \_\_\_\_\_ No \_\_\_\_\_

4 5. One Winchester Rifle, 300 caliber, S/N: 357ZV18768 with scope,

5 Yes \_\_\_\_\_ No \_\_\_\_\_

6 6. Six 12-gauge shotgun shells,

7 Yes \_\_\_\_\_ No \_\_\_\_\_

8 7. One Remington Scattergun technology shotgun, 12 gauge, S/N: AB641510M,

9 Yes \_\_\_\_\_ No \_\_\_\_\_

10 8. One magazine containing 10 rounds of .223 caliber ammunition,

11 Yes \_\_\_\_\_ No \_\_\_\_\_

12 9. One Christianson Arms Rifle, AR-15, .233 caliber, S/N: CA00572 with scope,

13 Yes \_\_\_\_\_ No \_\_\_\_\_

14 10. One Rifle circa 1955, M1 scout, S/N: ZX333,

15 Yes \_\_\_\_\_ No \_\_\_\_\_

16 11. One Savage Rifle, Model: 12, .223 caliber, S/N: G223693 with attached scope,

17 Yes \_\_\_\_\_ No \_\_\_\_\_

18 12. One Weatherby Mark V Rifle, 300 caliber, S/N: PB005045 with attached scope,

19 Yes \_\_\_\_\_ No \_\_\_\_\_

20 13. One Winchester Rifle, Model 1890, S/N: 265475,

21 Yes \_\_\_\_\_ No \_\_\_\_\_

22 14. One Stag Arms AR-15 Rifle, S/N: 31183,

23 Yes \_\_\_\_\_ No \_\_\_\_\_

24 15. 1360 rounds .223 caliber of ammunition,

25 Yes \_\_\_\_\_ No \_\_\_\_\_

26 16. 41 rounds of .40 caliber ammunition,

27 Yes \_\_\_\_\_ No \_\_\_\_\_

17. One Hopkins and Allen Arms Co revolver, safety police, S/N: F3473,

2 Yes \_\_\_\_\_ No \_\_\_\_\_

18. One Ruger revolver, Model GP-100, .357 magnum, S/N:175-30241,

4 Yes \_\_\_\_\_ No \_\_\_\_\_

5 19. One magazine containing 6 rounds of ammunition, .22LR caliber,

6 Yes \_\_\_\_\_ No \_\_\_\_\_

7 20. One Jennings Firearms handgun, Model J22, .22LR caliber, S/N:398957,

8 Yes \_\_\_\_\_ No \_\_\_\_\_

9 21. One magazine containing 5 rounds of ammunition, R-P .380 auto,

10 Yes \_\_\_\_\_ No \_\_\_\_\_

11 22. One Lorcin handgun, Model L380, .380 caliber, S/N:169235,

12 Yes \_\_\_\_\_ No \_\_\_\_\_

13 23. One Glock handgun, Model 42, .380 auto, S/N: ABBZ838,

14 Yes \_\_\_\_\_ No \_\_\_\_\_

15 24. One magazine containing 8 rounds of ammunition, .45 auto,

16 Yes \_\_\_\_\_ No \_\_\_\_\_

17 25. One Kimber handgun, Tactical Pro II, .45 auto, S/N: KR31496,

18 Yes \_\_\_\_\_ No \_\_\_\_\_

19 26. One magazine containing 8 rounds of ammunition, .45 auto,

20 Yes \_\_\_\_\_ No \_\_\_\_\_

21 27. One Wilson's Combat handgun, .45 auto, S/N: WCT17339,

22 Yes \_\_\_\_\_ No \_\_\_\_\_

23 28. One magazine containing 8 rounds of ammunition, .45 auto,

24 Yes \_\_\_\_\_ No \_\_\_\_\_

25 29. One Heckler and Koch handgun, USP compact, .45 auto, S/N:29-035159,

26 Yes \_\_\_\_\_ No \_\_\_\_\_

27 30. Six rounds of ammunition, R-P .357 magnum,

28 Yes \_\_\_\_\_ No \_\_\_\_\_

1           31. One Smith and Wesson revolver, .357 magnum, S/N: DBN5081,

2           Yes \_\_\_\_\_ No \_\_\_\_\_

3           32. One magazine containing six rounds of .45 caliber ammunition,

4           Yes \_\_\_\_\_ No \_\_\_\_\_

5           33. One Kahr handgun, Model P45, S/N: SB2808,

6           Yes \_\_\_\_\_ No \_\_\_\_\_

7           34. One black holster with two magazines containing eight each of .45 caliber rounds of  
8           ammunition,

9           Yes \_\_\_\_\_ No \_\_\_\_\_

10           35. Five rounds of ammunition; .38 Caliber; Three rounds of Winchester .38 SPL+P and two  
11           rounds of R-P .38 SPL,

12           Yes \_\_\_\_\_ No \_\_\_\_\_

13           36. One USA Chapter Arms Revolver, .38 SPL, U.C. Lite, S/N:14- 43202,

14           Yes \_\_\_\_\_ No \_\_\_\_\_

15           37. Four rounds of Hornady ammunition; .380 AUTO,

16           Yes \_\_\_\_\_ No \_\_\_\_\_

17           38. One Glock handgun, .380 caliber AUTO, Model 42, S/N: ABAK747, with magazine,

18           Yes \_\_\_\_\_ No \_\_\_\_\_

19           **H. Firearms from 2273 South G St**

20           The United States has, in its custody, firearms that were seized by state, local or federal law  
21           enforcement agencies from Club House at 2273 South G St, Fresno, CA 93721 on November 20, 2017  
22           as a result of the investigation into the racketeering and overt acts alleged in the Superseding Indictment.  
23           For any of these items, answer the following question: Do you unanimously find by a preponderance of  
24           the evidence that this property is subject to forfeiture?

25           1. Glock 9mm pistol; Model: 19; S/N: XTH290,

26           Yes \_\_\_\_\_ No \_\_\_\_\_

27           2. Smith and Wesson 5.56 caliber carbine, Model: M&P-15, S/N: ST94642,

28           Yes \_\_\_\_\_ No \_\_\_\_\_

1           3. Ruger .22 rifle; Model: 10; S/N: 120-29447,

2           Yes \_\_\_\_\_ No \_\_\_\_\_

3           4. Anderson Manufacture 5.56 caliber Carbine; Model: AM-15; S/N: 15079957,

4           Yes \_\_\_\_\_ No \_\_\_\_\_

5           5. Mossberg 12 ga shotgun; Model: PACHMAYR; S/N: J521128,

6           Yes \_\_\_\_\_ No \_\_\_\_\_

7           6. Magpull Industries Carbine AR-15; Caliber: 5.56; Model: 01171720201; S/N: Unknown,

8           Yes \_\_\_\_\_ No \_\_\_\_\_

9           7. Shotgun, Standard MFG Company LCC 12 ga; Model: DP12; S/N DP18494,

10          Yes \_\_\_\_\_ No \_\_\_\_\_

11          8. Pistol -30 Austria .45 Auto; S/N PWA060; Made in Austria, Glock Inc., Smyrna, GA,

12          Yes \_\_\_\_\_ No \_\_\_\_\_

14          DATE

15          FOREPERSON